

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

**In re: GERALD KEITH SUZORE,
Debtor.**

**Case No. 13-24153PJD
Chapter 7**

**UNITED STATES TRUSTEE'S MOTION FOR EXAMINATION
PURSUANT TO FED. R. BANKR. P. 2004**

In accordance with L. Bankr. R. 2004-1, the United States Trustee for Region 8 ("U.S. Trustee") moves for an examination of the Debtor, Gerald Keith Suzore ("Debtor") to be recorded by electronic recording systems, on June 14, 2013, at 1:30 p.m., *or such other date and time as the parties may agree*, to be conducted at the U.S. Trustee's office, 200 Jefferson Avenue, Suite 400, Memphis, Tennessee 38103; and that the Debtor be required to produce the documents and things indicated in Exhibit A hereto at this office by Tuesday, June 11, 2013.

WHEREFORE, THE ABOVE PREMISES CONSIDERED, the U.S. Trustee prays that the Court authorize an examination of the Debtor, Gerald Keith Suzore ("Debtor") to be recorded by electronic recording systems, on June 14, 2013, at 1:30 p.m., *or such other date and time as the parties may agree*, to be conducted at the U.S. Trustee's office, 200 Jefferson Avenue, Suite 400, Memphis, Tennessee 38103; and that the Debtor be required to produce the documents and things indicated in Exhibit A hereto at this office by Tuesday, June 11, 2013.

For any, and each, enumerated request for production of documents to which the Debtor cannot produce documents in response to the request, the U.S. Trustee requests that the Debtor

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complete and sign a narrative Statement, as attached (and reproducible) as Exhibit B, and return such statement(s) to the U.S. Trustee with the Debtor's document production.

Respectfully submitted,

SAMUEL K. CROCKER
UNITED STATES TRUSTEE FOR REGION 8

By: /s/ Karen P. Dennis, Trial Attorney (#06204)
United States Department of Justice
Office of the United States Trustee, Region 8
200 Jefferson Avenue, Suite 400
Memphis, Tennessee 38103-2374
(901) 544-3211 / fax (901) 544-4138

CERTIFICATE OF SERVICE

I, Karen P. Dennis, hereby certify this 30th day of May, 2013, service of a true and accurate copy of the foregoing by electronic means and/or via regular U.S. Mail, postage prepaid, to the following persons in accordance with Guideline 17B of the Amended Guidelines for Electronic Filing.

/s/ Karen P. Dennis, Trial Attorney

Debtor
Debtor's attorney
Chapter 7 Trustee

EXHIBIT A

When used below, the following definitions should apply:

"Documents" means all documents, reports, handwritten notes, writings in any form, memoranda, records, data compilation in any form, computer software and/or hardware, checks, invoices, drafts, instruments, and all other items and things, in the broadest sense.

"Debtor," "Debtors," and/or "You" when used herein means: the individual(s), or business entity(ies), that filed the bankruptcy petition, and his/her spouse (whether a filing Debtor or not).

1. Produce the Debtor's federal, state, and city personal income tax returns for 2011 and 2012 inclusive of all W-2 statements, 1099 statements, and all schedules and attachments filed with said return(s).
2. For the six (6) full months immediately preceding the month the bankruptcy case was filed, and for the month the bankruptcy case was filed, produce all pay advices, pay stubs and earnings statements (including documentation of other income such as alimony, child support, supplemental income, food stamps, pension income, etc.), (hereinafter, "pay advices"), received by either Debtor, and any persons living at the Debtors' residence. Pay advices for any and all part-time or "second" jobs (including any military reserve or National Guard job) should be included, as well.
3. Provide documentation for the "contingent, unliquidated, disputed" debts listed on Schedule F including any papers from any lawsuit(s) filed against the Debtor or family members.
4. Provide a copy of any and all unemployment compensation documents, including latest award or denial letter, as well as a copy of the separation notice received from the employer, and documentation of any severance pay awarded or received.
5. Provide a copy of all domestic support orders, property settlement agreement(s) and the divorce complaint, answer, and decree
6. For the six (6) full months immediately preceding the month the bankruptcy case was filed, and for the month the bankruptcy case was filed, produce bank and/or credit union statements for all accounts in which the debtor has any ownership interest or signatory authority, and copies of the most recent statements for all investment and retirement accounts owned by Debtor, or in which he has any pecuniary interest.
7. Provide documentation of the loan from Debtor's father, Ronnie Suzore, including any promissory note or other writing evidencing the debt, and records of all re-payments made to date by the Debtor.

EXHIBIT B
DEBTORS STATEMENT AS TO PRODUCTION
OF CERTAIN DOCUMENTS

I, _____, the Debtor in the above referenced Chapter 7 case have reviewed the United States Trustee's request for production of certain documents. As to the United States Trustee's request enumerated as #_____ I am unable to produce said documents for the following reason(s):

(If applicable), I, _____, the Joint Debtor in the above referenced Chapter 7 case have reviewed the United States Trustee's request for production of certain documents. As to the United States Trustee's request enumerated as #_____ I am unable to produce said documents for the following reason(s):

I declare, under penalty of perjury, that the foregoing statement is true and correct.

Executed on: _____ Debtor: _____
(Signature)

Executed on: _____ Joint
Debtor: _____
(Signature)

A separate Exhibit B Statement shall be completed and signed as to each singularly enumerated document production request to which the Debtor is unable to produce requested documents.